

## HONORABLE JOHN H. CHUN

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SHENZHEN ROOT TECHNOLOGY CO., LTD.,  
HONG KONG LUTE TECHNOLOGY CO.,  
LIMITED, AND SHENZHEN CONGLIN E-  
COMMERCE CO., LTD.,

Case No. 2:23-cv-631-JHC

Plaintiffs,

**STIPULATION AND PROPOSED  
ORDER TO EXTEND CASE  
DEADLINES**

CHIARO TECHNOLOGY LTD.,

Defendant.

CHIARO TECHNOLOGY LTD.,

### Counterclaim Plaintiff,

V.

SHENZHEN ROOT TECHNOLOGY CO., LTD.,  
HONG KONG LUTE TECHNOLOGY CO.,  
LIMITED, SHENZHEN CONGLIN E-  
COMMERCE CO., LTD, SHENZHEN ROOT E-  
COMMERCE CO., LTD., SHENZHEN TPH  
TECHNOLOGY CO., LTD., SHENZHEN  
JINRUIXING TECHNOLOGY CO., LTD.,  
SHENZHEN LUTEJIACHENG NETWORK  
TECHNOLOGY CO., LTD., and SHENZHEN  
JINRUIHANG TECHNOLOGY CO., LTD..

## Counterclaim Defendants.

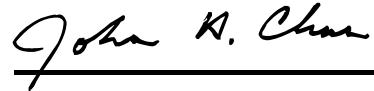
1 Pursuant to LCR 7(d)(1), Counterclaim Plaintiff Chiaro Technology Ltd. (“Counterclaim  
 2 Plaintiff”) and Counterclaim Defendants Shenzhen Root Technology Co., Ltd., Hong Kong Lute  
 3 Technology Co., Limited, Shenzhen Conglin Ecommerce Co. Ltd., Shenzhen Jinruihang  
 4 Technology Co., Ltd., and Shenzhen Lutejiacheng Network Technology Co., Ltd. (collectively,  
 5 “Moving Counterclaim Defendants”), through their respective undersigned counsel, hereby  
 6 stipulate to extend the time for Moving Counterclaim Defendants to answer or otherwise respond  
 7 to Counterclaim Plaintiff’s Counterclaim (Dkt. 69). The extension would move the deadline for  
 8 responding to the Counterclaim by 30 days to October 5, 2023.

9 Counterclaim Plaintiff and Counterclaim Plaintiff’s counsel further agree and acknowledge  
 10 that, other than the defense of insufficient service, this stipulation does not constitute a waiver of  
 11 any defense of Moving Counterclaim Defendants, including but not limited to the defense of lack  
 12 of personal jurisdiction or improper venue.

13 The parties respectfully submit that there is good cause for this stipulation. The extension  
 14 of time is reasonable under the circumstances, as the Counterclaim was filed on August 14, 2023,  
 15 comprises over 400 pages together with the Answer and exhibits, and will require counsel for  
 16 Counterclaim Defendants to respond on behalf of five Moving Counterclaim Defendants, all of  
 17 whom are located in China with limited English-speaking capability. The extension will not  
 18 interfere with any other case deadlines, and no other deadlines need to change.

19 Accordingly, the parties respectfully request that the Court extend the deadline for Moving  
 20 Counterclaim Defendants to answer or otherwise respond to the Counterclaim, as set forth in this  
 21 stipulation.

1 IT IS SO ORDERED this 5th day of September, 2023.  
2  
3

4   
5

6 John H. Chun  
7 United States District Judge  
8

9 DATED this 1st day of September, 2023  
10  
11

12 STERNE KESSLER GOLDSTEIN & FOX  
13 PLLC  
14

15 */s/Josephine Kim*  
16 Nirav Desai  
17 Josephine Kim  
18 Richa Patel  
19 STERNE KESSLER GOLDSTEIN & FOX  
20 PLLC  
21 1100 New York Avenue, NW, Suite 600  
22 Washington, DC 20005  
23 Telephone: 202.772.8904  
24 Email: [joskim@sternekessler.com](mailto:joskim@sternekessler.com)  
[ndesai@sternekessler.com](mailto:ndesai@sternekessler.com)  
[rpatel@sternekessler.com](mailto:rpatel@sternekessler.com)

25 DORSEY & WHITNEY LLP

26 */s/Paul T. Meiklejohn*  
27 PAUL T. MEIKLEJOHN WSBA # 17477  
28 ERIN KOLTER WSBA #53365  
29 ROBERT J.M. LEE WSBA # 49971  
30 **Dorsey & Whitney LLP**  
31 Columbia Center  
32 701 Fifth Avenue, Suite 6100  
33 Seattle, WA 98104  
34 (206) 903-8800  
35 Emails: [meiklejohn.paul@dorsey.com](mailto:meiklejohn.paul@dorsey.com)  
[kolter.erin@dorsey.com](mailto:kolter.erin@dorsey.com)  
[lee.robert@dorsey.com](mailto:lee.robert@dorsey.com)

36 ATTORNEYS FOR DEFENDANT AND  
37 COUNTERCLAIM PLAINTIFF CHIARO  
38 TECHNOLOGY, LTD.  
39

40 ATTORNEYS FOR PLAINTIFFS  
41 SHENZHEN ROOT TECHNOLOGY CO.,  
42 LTD., HONG KONG LUTE  
43 TECHNOLOGY CO., LIMITED, AND  
44 SHENZHEN CONGLIN E-COMMERCE  
45 CO., LTD. AND COUNTERCLAIM  
46 DEFENDANTS SHENZHEN ROOT  
47 TECHNOLOGY CO., LTD., HONG KONG  
48 LUTE TECHNOLOGY CO., LIMITED,  
49 SHENZHEN CONGLIN E-COMMERCE  
50 CO., LTD., SHENZHEN JINRUIHANG  
51 TECHNOLOGY CO., LTD., AND  
52 SHENZHEN LUTEJIACHENG NETWORK  
53 TECHNOLOGY CO., LTD.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record via ECF Notification:

<p>Brian C. Park  Jacqueline Middleton  STOEL RIVES LLP  600 University Street, Suite 3600  Seattle, WA 98101  Telephone: 206.386.7542  Facsimile: 206.386.7500  Email: <a href="mailto:brian.park@stoel.com">brian.park@stoel.com</a>  <a href="mailto:jacqueline.middleton@stoel.com">jacqueline.middleton@stoel.com</a></p>	<p>Mark P Walters  Mitchell D West  LOWE GRAHAM JONES PLLC  1325 Fourth Avenue, Suite 1130  Seattle, WA 98101  Telephone: 206.850.8088  Email: <a href="mailto:walters@lowegrahamjones.com">walters@lowegrahamjones.com</a>  <a href="mailto:west@lowegrahamjones.com">west@lowegrahamjones.com</a></p>
<p>Qianwu Yang (pro hac vice)  Xiaomin Cao (pro hac vice)  SHM LAW FIRM  25 F, China Resources Tower,  2666 Keyuan South Rd., Nanshan  Shenzhen, China 518052  Tel.: +86 139 2521 2009  Fax: +86 755 8326 6693  Email: <a href="mailto:yang@shm.law">yang@shm.law</a>  <a href="mailto:cao.xiaomin@shm.law">cao.xiaomin@shm.law</a></p>	<p>Josephine Kim  Nirav Desai  Richa Patel  STERNE KESSLER GOLDSTEIN &amp; FOX  PLLC  1100 New York Avenue, NW, Suite 600  Washington, DC 20005  Telephone: 202.772.8904  Email: <a href="mailto:joskim@sternekessler.com">joskim@sternekessler.com</a>  <a href="mailto:ndesai@sternekessler.com">ndesai@sternekessler.com</a>  <a href="mailto:rpatel@sternekessler.com">rpatel@sternekessler.com</a></p>
<p>Eric R Chad  MERCHANT &amp; GOULD (MN)  150 S Fifth Street, Suite 2200  Minneapolis, MN 55402  Telephone: 612.332.5300  Email: <a href="mailto:echad@merchantgould.com">echad@merchantgould.com</a></p>	
<p>Joshua A Hartman  MERCHANT &amp; GOULD (VA)  1900 Duke Street, Suite 600  Alexandria, VA 22314  Telephone: 703.684.2500  Email: <a href="mailto:jhartman@merchnatgould.com">jhartman@merchnatgould.com</a></p>	

Dated this 1st day of September, 2023.

1 */s/Paul T. Meiklejohn* \_\_\_\_\_  
2 Paul T. Meiklejohn  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25